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Regarding: Closed Captioning Requirements
ET Docket No. 99-254
for Digital Television Receivers

My name is Arvilla Rank. I am Executive Director of the National Catholic Office for the Deaf (NCOD) located in Landover Hills, Maryland. Our office serves as a consultant to Catholic Dioceses throughout the United States, Canada and some foreign countries. There are more than six million Catholics who are deaf, hard-of-hearing, late deafened, deaf-blind or deaf with low vision in the United States. Since I myself am deaf, I use Closed Captioning any time I watch television, so the requirements for Digital Television Receivers are especially important to me as well as the population we serve.

I want to thank the FCC for initiating this proceeding. It is a wonderful opportunity for the deaf community to provide input. Please implement the entire EIA-708 standard. Section 9 is not enough. The technology is available. Those who benefit from closed captioning have been denied access for too long. It is also an excellent opportunity to correct some of the current problems television sets such as requiring sound at the same time as captions.

The most important issue before us now is to initiate the entire FCC's proposal. We need to fully capitalize on the new digital features available as follows:

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Size of Captions: The existing FCC caption standard does not provide the ability to change the size of closed captions. This has been a problem for individuals with low vision, including many senior citizens. This has also been a problem for those sitting at a distance from smaller TV sets with lower case captioned lettering. New digital technologies (and the EIA-708 standard) enable viewers to control the size of captions—this is often referred to as "caption volume control." But the standard proposed by the FCC contained in Section 9 only recommends one standard size of captions. We urge the FCC to adopt the full EIA-708 standard, which will allow viewers to alter the size of captions the same way they can alter the sound TV set's volume.

Color: Section 9 would only require decoders to use solid black backgrounds. In contrast, EIA-708 as a whole would permit users to choose from a variety of foreground and background colors, so that viewers can create contrasts against various backgrounds. The proposed FCC standard as drafted is unnecessarily limiting.

Font: EIA-708, Section 9 proposes only one font. But EIA-708 in its entirety would permit viewers to choose from among eight (8) different fonts. The FCC should adopt a standard that offers viewers the most choices available with the new digital technologies, especially for those who need different color contrast options to see optimally.

Number of Captioning Services: The FCC's rules currently require decoders to be capable of decoding captioning data for two (2) captioning services at the same time. In fact, most TV receivers can decode up to four (4) captioning streams. The proposed standard, Section 9, would only require decoders to decode and process data for one captioning service. This is not only too limiting; it actually takes a step backward. The FCC should adopt a standard that requires digital television equipment to decode all of the standard and extended digital services (six (6) standard services and up to 57 additional extended services).

Dual Mode Receivers: We support the FCC's proposal to require DTV receivers to operate in a dual mode (this would decode programming sent in both analog and digital formats). This will be important as we go through the transition from analog to digital TV.

DTV Converter Boxes and Tuners: We support the FCC's proposal to require DTV converter boxes and tuners to decode closed captions in either the analog or digital format. This should be required regardless of the size of the television to which the converter or tuner is connected.

Additional Standards: The FCC should take this opportunity to fix some existing problems with television receivers vis-a-vis the processing and display of closed captions. Specifically, the FCC should create the following mandates:

If the viewer chooses captions, they should not cut off when the television is turned off or the channel is changed. In other words, consumers should not have to continually turn on captions each time they turn on the TV or change a channel, rather if captions

are chosen, this should become the default mode. The captioning feature and the mute feature should not be connected. A viewer should not have to turn on mute to receive captions. This makes it impossible for mixed (hearing and deaf/hard of hearing) audiences to watch television together. It should be easy to access captions through a button on the remote, and through a first menu of choices. Viewers should not have to go through long menu mazes to figure out how to obtain captions (this is particularly important in hotels and other locations where the viewer is not familiar with the television equipment.)

Thank you again, for this wonderful opportunity to provide this input on FCC rules. I strongly urge you to strengthen the rules to provide as much access now that is possible to enable the six million deaf, hard-of-hearing, deaf-blind Catholics among your viewers to fully benefit from all TV programs as do their hearing brothers and sisters.

Sincerely,

A handwritten signature in black ink, appearing to read "Arvilla Rank". The signature is fluid and cursive, with the first name "Arvilla" written in a larger, more prominent script than the last name "Rank".

Arvilla Rank
Executive Director